

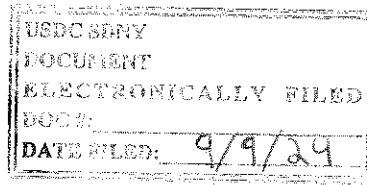
# VedderPrice

## MEMO ENDORSED

Chicago  
New York  
Washington, DC  
London  
San Francisco  
Los Angeles  
Singapore  
Dallas  
Miami  
vedderprice.com

Jeffrey J. Ansley  
Shareholder  
+1 (469) 895 4790  
jansley@vedderprice.com

September 5, 2024



The Honorable Lewis A. Kaplan  
United States District Judge  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Matthew Queen, Case No. 24 Cr. 291 (LAK)***

Dear Judge Kaplan:

Southwestern Baptist Theological Seminary (“SWBTS” or the “Seminary”) respectfully submits this letter motion to intervene in *United States v. Matthew Queen*, Case No. 24 Cr. 291 (LAK). The Seminary is the legal privilege holder over certain information disclosed in the Defendant’s Memorandum in Support of Motion to Dismiss Information (the “Motion to Dismiss”). Dkt. 31.

As the privilege holder, the Seminary moves to intervene in this case to protect its privileges and to assure that its privileged information remains protected. In that regard, the Seminary respectfully requests that the relevant exhibits attached to the Defendant’s Motion to Dismiss remain restricted on the Court’s docket as they are currently or, alternatively, that the motion be refiled with the relevant exhibits under seal. Because the Seminary is the privilege holder over the materials in question, the Defendant may not waive the Seminary’s privileges. Therefore, the Seminary respectfully requests the Court’s approval to intervene in this case for the limited purpose of ensuring that its attorney-client and any related privileges are preserved.

### **I. FACTUAL BACKGROUND**

On or about October 11, 2022, the United States Attorney’s Office for the Southern District of New York (the “government” unless otherwise stated) served a subpoena on SWBTS for the production of certain documents related to an ongoing grand jury investigation. The Seminary was represented by counsel throughout the investigation.

On or about November 3, 2022, allegations against a then-Seminary student were brought to the attention of one of the Seminary’s employees (“Employee 1”). Employee 1 subsequently confirmed that local law enforcement, the Burleson Police Department, was investigating the allegations against the student. In January 2023, that investigation resulted in the issuance of an arrest warrant for the Seminary student in connection with the November 2022 allegations.

Memorandum Endorsement

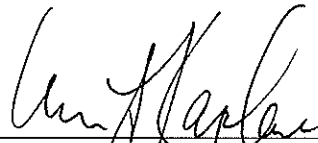
United States v. Queen, 24-cr-0291 (LAK)

Southwestern Baptist Theological Seminary ("SWBTS") has moved to intervene to request that the relevant exhibits attached to the defendant's motion to dismiss remain restricted on the Court's docket as they were at the time the motion was made or, alternatively, requiring that the motion be refiled with the relevant exhibits under seal.

On September 4, 2024, the Court granted the government's request that the defendant's motion be removed from the docket and refiled with certain exhibits under seal and various redactions. It therefore appears that the SWBTS motion is moot and, in consequence, it is denied without prejudice to a renewed motion if that should appear to be appropriate.

SO ORDERED.

Dated: September 9, 2024

A handwritten signature in black ink, appearing to read "Lewis A. Kaplan", is written over a horizontal line.

Lewis A. Kaplan  
United States District Judge